

Andres Diaz (A4309)  
Thomas D. Neeleman (A4639)  
Geoffrey L. Chesnut (A12058)  
**RED ROCK LEGAL SERVICES, P.L.L.C.**  
491 North Bluff Street, Ste. 301  
Saint George, UT 84770  
Telephone: (435) 634-1000  
Fax: (435) 634-1001  
Email: courtmailrr@expresslaw.com

IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF UTAH, CENTRAL DIVISION	
In Re: <b>Russell Carter Feller Janell Kaye Feller Debtor(s).</b>	<b>Bankruptcy No. 19-26233 Chapter 13  Judge William T. Thurman</b>
<b>OBJECTION TO TRUSTEE’S MOTION TO DISMISS.</b>	

**Russell Feller** and **Janell Feller**(“the Debtors”), by and through Counsel, Red Rock Legal Services, P.L.L.C., hereby object to the dismissal of their case. The Debtors base this Objection on the following:

1. The Chapter 13 Trustee filed a Motion to Dismiss due to the Debtors’ failure to tender the initial plan payment at the 341 Meeting as required by 11 U.S.C. §1326(a) and Local Rule 2083-1(A).
2. The website maintained by the Chapter 13 Trustee indicates receipt of the Debtors’ initial plan payment on October 17, 2019.

WHEREFORE, the Debtors respectfully move this Court for an Order denying the Trustee’s Motion to Dismiss.

DATED this day 23 October 2019.

/s/ Geoffrey L. Chesnut

Attorney for Debtor

CERTIFICATE OF SERVICE

I hereby certify that on October 23, 2019, a true and correct copy of this Objection was mailed via United States First-Class mail, postage prepaid, to the Debtors and via ECF to all parties requesting notice by the same.

/s/ Geoffrey L. Chesnut